

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

APR 01 2020

United States of America

v.

Jose Martin GARZA

David J. Bradley, Clerk of Court

Case No. C-20-1026m

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 02, 2019 in the county of Brooks in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 21 USC 846

Offense Description

Conspiracy to possess with the intent to distribute a controlled substance listed in Schedule II the Controlled Substance Act of 1970, to wit: 10.016 kilograms (Aggregate Net Weight) of heroin.

This criminal complaint is based on these facts:

See attachement A

☒ Continued on the attached sheet.

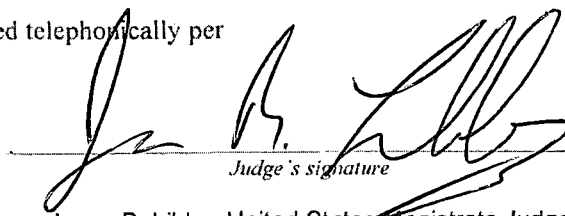
Complainant's signature

Robert E. LaRock, DEA Task Force Officer

Printed name and title

Submitted by reliable electronic means, sworn to, signature attested telephonically per
Fed.R.Crim.P. 4.1, and probable cause found:

Date: 04/01/2020



Judge's signature

City and state: Corpus Christi, Texas

Jason B. Libby, United States Magistrate Judge

Printed name and title

Attachment A

On July 2, 2019, a Ford Flex vehicle entered into the U.S. Border Patrol Checkpoint outside of Falfurrias, Texas. During the inspection, a Border Patrol Service K9 alerted to the vehicle and agents conducted a detailed search. Ultimately, agents located and seized approximately 10 kilograms of heroin and 2 kilograms of cocaine concealed within the fenders of the Ford Flex. The driver of the vehicle was placed under arrest and agents seized a cellular device. DEA Corpus Christi was notified of a seizure and responded to the checkpoint to continue the investigation.

In February 2020, DEA agents interviewed a cooperating defendant (CD1) who has plead guilty to possession with intent to distribute a controlled substance in the Southern District of Texas. CD1 provided information regarding a drug trafficking organization (DTO) which transported controlled substances from the Rio Grande Valley to Atlanta. CD1 stated that he/she had information regarding a seizure that occurred on July 2, 2019 at the U.S. Border Patrol Checkpoint. CD1 indicated that Jose Martin GARZA was a member of the DTO and was responsible for transferring vehicles loaded with controlled substances to drivers who ultimately delivered the vehicles to other locations throughout the United States. CD1 stated that in July 2019, GARZA delivered a white Ford Flex which was seized by law enforcement after multiple kilograms of heroin and cocaine were discovered concealed within the vehicle. CD1 stated that the DTO utilized two identical vehicles which were registered in different states to transport the controlled substances between Texas and Georgia. CD1 stated that vehicles were used approximately eight times during November 2018 and July 2019. CD1 provided agents a phone number which he/she stated was utilized by GARZA. DEA agents showed CD1 a six person photo lineup that contained a known photo of GARZA. CD1 viewed the lineup and positively identified GARZA as the individual who had provided the white Ford Flex seized by law enforcement.

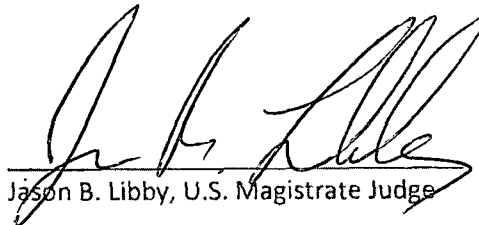
DEA agents were able to identify two identical Ford Flex vehicles, each registered in a different state, as described by CD1. A review of electronic databases, showed that both vehicles were in Georgia between January 2019 and June 2019 a total of six different times. Agents were also able to determine that during the same time frame, both of the vehicles were also located in Texas. Agents note that the phone number CD1 provided for GARZA was stored in the cellular phone seized at the U.S. Border Patrol Checkpoint on July 2, 2019.



Robert LaRock,
Task Force Officer, DEA

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P 4.1., and probable cause found:

Date: April 1, 2020
City and State: Corpus Christi, Texas



Jason B. Libby, U.S. Magistrate Judge